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October 13, 2015

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

We respectfully request that the Court enlarge the time to submit a fee application pursuant to Fed. R. Civ. P. 54(d)(2)(B) until after appellate proceedings have been completed.

A fee application at this time would require piecemeal evaluation of the plaintiffs' fee award. In addition, the delay in the payment of fees due to the stay of execution would merit an upward adjustment, which cannot be set until appellate proceedings are complete. *See Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 556 (2010) ("Compensation for [the delay in fees paid under fee-shifting statutes] is generally made 'either by basing the award on current rates or by adjusting the fee based on historical rates to reflect its present value.'") (citing *Missouri v. Jenkins*, 491 U.S. 274, 282 (1989)).

While plaintiffs originally requested (and defendants agreed) that the fee application be stayed once filed, an enlargement would be more efficient because it will eliminate the burden of requiring plaintiffs to amend and supplement the fee application after the appeal is complete.

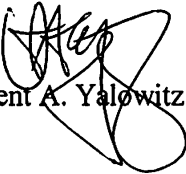
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Respectfully,



Kent A. Yalowitz

cc: All ECF Counsel